

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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| IN RE: | : | CHAPTER 13 |
| LARRY DONNELL RASCOE | : | |
| aka Larry Donnell Rascoe, Sr | : | CASE NO. 1:19-bk-04360 |
| MICHELLE CHARLENE RASCOE | : | |
| aka Michelle Rascoe | : | |
| Debtors | : | |
| | : | |
| Specialized Loan Servicing LLC, as | : | |
| servicing agent for The Bank of New York | : | |
| Mellon FKA The Bank of New York, as | : | |
| Trustee for the certificateholders of the | : | |
| CWABS, Inc., Asset-Backed Certificates, | : | |
| Series 2007-10 | : | |
| Movant | : | |
| | : | |
| LARRY DONNELL RASCOE | : | |
| aka Larry Donnell Rascoe, Sr | : | |
| MICHELLE CHARLENE RASCOE | : | |
| aka Michelle Rascoe | : | |
| Respondents | : | |

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. The Debtors lack knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
6. Admitted.
7. Denied as stated. The debtors have applied for a loan modification and the mortgage company advised them not to send regular payments pending their review. The mortgage company has informed the debtors that it has all required documents that the debtor submitted.
8. Admitted that if the mortgage is not modified, that the amount stated is the approximate arrearage; however, Debtors have set aside some funds if necessary to pay the mortgage prior to the loan modification decision being made.

9. Denied. See responses to paragraphs 7 and 8.
10. The Debtors lack knowledge or information sufficient to form a belief as to the truth of this averment, and therefore deny the same.

WHEREFORE, the Debtors respectfully request that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
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